

**FILED - MQ**

August 3, 2018 2:11 PM

Thomas L. Dorwin, CLERK OF COURT  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**UNITED STATES DISTRICT COURT**

for the

Western District of Michigan

\_\_\_\_ Criminal/Civil \_\_\_\_ Division

**2:18-cv-132**Gordon J. Quist, US District Judge  
Timothy P. Greeley, US Magistrate Judge

Rebecca Suzanne Denofre

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Wells Fargo, Sean Geary, Janet LaJoie, Julie Johnson, Susan Johnson and Darlene Korpi

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Rebecca Suzanne Denofre
Street Address	600 Altamont Street 102
City and County	Marquette City and Marquette County
State and Zip Code	Michigan and 49855
Telephone Number	906-236-9869
E-mail Address	rsfrailing@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	Wells Fargo & Company
Job or Title <i>(if known)</i>	American multinational financial services company
Street Address	101 N. Phillips Ave.
City and County	Sioux Falls and Hartford County
State and Zip Code	South Dakota 57104
Telephone Number	605-575-6900
E-mail Address <i>(if known)</i>	<a href="http://www.wellsfargo.com">http://www.wellsfargo.com</a>

## Defendant No. 2

Name	Sean Geary
Job or Title <i>(if known)</i>	District Manager
Street Address	101 W Washington St.
City and County	Marquette and Marquette County
State and Zip Code	Marquette 49855
Telephone Number	906-228-1203
E-mail Address <i>(if known)</i>	N/A

## Defendant No. 3

Name	Janet LaJoie
Job or Title <i>(if known)</i>	Branch Manager
Street Address	700 US Hwy 41 West
City and County	Ishpeming and Marquette County
State and Zip Code	Michigan 49849
Telephone Number	906-486-4407
E-mail Address <i>(if known)</i>	N/A

## Defendant No. 4

Name	Julie Johnson
Job or Title <i>(if known)</i>	Sales Associate Shelly's Floral
Street Address	850 County Road MU
City and County	Negaunee and Marquette County
State and Zip Code	Michigan 49866
Telephone Number	N/A
E-mail Address <i>(if known)</i>	N/A

Defendant No. 5

Name Susan Johnson

Job or Title Housewife

Street Address 1104 Keewaydin Street

City and County Negaunee and Marquette County

State and Zip Code Michigan 49866

Telephone Number 906-250-2927

E-mail Address N/A

Defendant No. 6

Name Darlene Korpi

Job or Title Self Employment (Cleaning)

Street Address 96 E County Road Ma

City and County Negaunee and Marquette County

State and Zip Code Michigan 49866

Telephone Number 906-475-9026

E-mail Address darlenekorpi@icloud.com

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

FRAUD AND CORRUPTION falls under THE FEDERAL FALSE CLAIMS ACT? "LINCOLN'S LAW"  
Correct?

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.



b. If the defendant is a corporation

The defendant, (name) Wells Fargo, Sean Geary, Janet LaJoie, is incorporated under the laws of the State of (name) American Multinational Financial Co, and has its principal place of business in the State of (name) California.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) Wells Fargo Headquarters.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Listed on additional pages

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### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks punitive damages for all money's lost, plus medical treatment and loss of income. And the loss of my best friend of 7th grade because I have the courage to speak out against all these criminals, who refuse to show their 3rd FACE. (False Face)

1 million US\$ is the damage amount. Also asking that all parties be charged and this story is to go public. Our own beautiful county of Marquette, harboring criminals who work in our local banks.

#### Statement of Claim

Wells Fargo I am hurt by Abusive and Fraudulent tactics. Suffering with symptoms and effects of Harassment by management. David L. Baker, Janet LaJoie and Sean Geary. When will we see the repeal of Too Big to Jail? Americans are just pray for Greedy, Scheming Corporations. This must change! Employees told to do whatever it takes to meet the sales quotas. Their CHEK SYSTEMS to open accounts and only looking at historical factors not to see if they are real. Just to make their sales quotas. Opening BOGUS accounts and then your life is threatened by these account holders. Harm is an understatement! Societal effects I'm the social outcast, psychological symptoms thoughts of suicide, extreme depression, crying, stressed, feeling angry, psychologically and emotionally raped. Not being believed or fully understood. Want a safe effective format where I will be believed! And let's not forget the physical symptoms stomach ailments, headaches, insomnia. I became homeless! Accounts #8140746796 and #6408207170 demanding money. Who opened and approved these accounts? Employees? They got passed the CHEK SYSTEM. What was the perk for Wells Fargo?

Then I receive a phone call on 02/23/2018 at home asking me to get my password from branch. Called from 800-869-3557 32 minutes long. Why? Telephone Harassment, Malicious Use of Telephone Service. My account had been closed. Yes I opened an account in the fall of 2016 with Deb Hicks service manager with Darlene Korpi sitting next to me, in the Ishpeming Branch.

#### Statement of Claim

Sean Geary I am hurt by dishonesty, deception and fraud. I met with Mr. Geary once to report criminal acts fall of 2017. Spoke on phone twice. Fall of 2017. Accessory, aiding and abetting working together with and direction of Janet LaJoie branch manager of Ishpeming branch. Failure to report to upper management. Mr. Sean Geary is my son's Justin Berkel friend. Also friends of Susan Johnson's boys Wayne, Ray and Leander Johnson. Boy's mother Susan Johnson is an accessory to the crime.

#### Statement of Claim

Janet LaJoie I personally know Janet LaJoie. Been to many social activities in her presence. Janet Lajoie is reckless and abusive! We are 3 victims targeted by her, Karin Goodreau worked with Janet in Marquette, MI Robert Kemp a gay man which she discriminated against in Ishpeming, MI. Mr. Kemp he wanted to take his life SUICIDE because of Janet LaJoie. She is very unethical! I want her charged with Obstruction of Justice making false FALLACY statements to a police officer on Sat. 02/24/2018 when I was attacked by her. Only asking the nice clerk for that password. I was lunged at! ACCESSORY to a crime I have been a victim to this branch manager since Susan Johnson confessed to me the \$100,000.00 to cover.

#### Statement of Claim

Julie Johnson Suspect of the crime. Perpetrator. Took the \$100,000.00 from Susan Johnson. Honor Karl Weber I will ask the courts for help. I need a Subpoena to gather the facts. Sean Geary did tell me she was let go for wrong doings. Can we bring in an audit regulator to audit all



accounts of Mr. Sean Geary, Janet LaJoie and Julie Johnson? Cartoon commentary "The Y in the Road" Trust vs Trickery...Letter to the Editor found in the Mining Journal. Interesting!

Statement of Claim

Susan Johnson owner of Eastwood Nursing Center Inc. 900 Maas St. Negaunee, MI and Norlite Nursing Center Inc. 701 Homestead St. Marquette, MI

Gave the funds to cover the crime. Criminal Musings. Saturday June 2, 2018 I received a phone call from Susan telling me that she would lie to the courts to cover all criminal law.

ACCESSORY. Susan is in default. I want to file a judgement for default. They are all acting to work together towards the same result or goal to hide the true facts of a crime to protect. And to protect the above businesses listed above. So this did not go public.

Statement of Claim

Darlene Korpi Friend since 7<sup>th</sup> grade. Cousin of Julie Johnson. Blood is thicker than water. Darlene came to my house on Cooper Lake Road demanding that I get in her husband's truck. Fall of 2016. Witnessed by Mark W. Frailing. I was told by Darlene that this would never be spoken of and I would take to my grave. I'm refusing be an accessory to a criminal law. What find of friend would ask this of another friend? She is a accessory.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

08/03/2018

Signature of Plaintiff

Printed Name of Plaintiff

*Rebecca S. Denofre*  
 Rebecca S. Denofre

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address